

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REBECCA SAVEAL,

Plaintiff,

v.

**THE KROGER CO; KROGER
TEXAS L.P; and DOES 1-10,**

Defendants.

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CIVIL ACTION NO. 3:21-cv-02822-L

MOTION TO WITHDRAW AS PLAINTIFF’S COUNSEL

PLEASE TAKE NOTICE that the undersigned attorney of record for Plaintiff, Rebecca Saveal (hereinafter “Plaintiff”), respectfully requests that this Court enter an order granting leave for Attorney, M. Jermaine Watson to withdraw as counsel for Plaintiff. This Motion to Withdraw as Plaintiff’s Counsel is based upon the following information, and Attorney Watson hereby states:

1. On May 16, 2022, Plaintiff continued her appearance by the representation of the undersigned counsel – M. Jermaine Watson.
2. Plaintiff and counsel, M. Jermaine Watson, have had irreconcilable differences regarding how to proceed this her case.
3. Plaintiff has been given verbal and written notice that M. Jermaine Watson intends to withdraw as her counsel of record, and Plaintiff releases M. Jermaine Watson as her counsel.
4. As such, Attorney Watson respectfully requests that this Court enter an order allowing for his withdrawal from this case as well as a stay of this matter as it pertains to Plaintiff of at least sixty (60) days to allow her to retain new counsel.

WHEREFORE, upon hearing hereof, the undersigned Attorney Watson prays that this Court enter an order allowing for his withdrawal from representing Plaintiff in this matter.

Respectfully submitted by,

/s/ M. Jermaine Watson
M. Jermaine Watson
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**ATTORNEYS FOR PLAINTIFF
REBECCA SAVEAL**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that a conference was held with Defendant's counsel on July 26, 2022, regarding the relief requested in this motion and an extension of discovery deadlines until Ms. Saveal could obtain counsel. Defendant's counsel informed the undersigned that both requests were unopposed.

/s/ M. Jermaine Watson
M. Jermaine Watson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Motion to Withdraw as Plaintiff's Counsel* has been served to all counsel of record in this cause via the Court's CM/ECF electronic filing system on August 2, 2022.

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/s/ M. Jermaine Watson

M. Jermaine Watson